

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
ATHENS DIVISION

TERRIE BUCKNER,)	
)	
Plaintiff,)	
)	CIVIL ACTION FILE NO.
v.)	3:06-CV-79 (CDL)
)	
KAREN SHETTERLEY,)	
)	
Defendant.)	

AFFIDAVIT OF A. LEE PARKS

COMES NOW A. Lee Parks of the law firm of Parks, Chesin & Walbert, P.C., counsel for the Plaintiff in the above-referenced matter, who came before the undersigned officer duly authorized to administer oaths and, after being duly sworn, states the following based upon his personal knowledge.

1.

My name is A. Lee Parks. I give this affidavit for use in this case for all the purposes allowed by law.

2.

I am an attorney licensed to practice law in the State of Georgia, and am counsel of record for the Plaintiff in the above-referenced matter. I have practiced civil rights

law based in Atlanta, Georgia since June 1977. I have thirty-one (31) years of continuous full-time experience as a trial lawyer. I specialize in civil rights and constitutional law litigation as well as employment law.

3.

I graduated from Emory University Law School in 1977. While in law school, I served on the Board of Editors for the Emory Law Journal and was a Director of the Emory Moot Court Society. I have published two legal articles on constitutional law related subjects: 25 Emory Law Journal 983 (1976); and 16 Georgia State Bar Journal 129 (1980). I am a regular speaker at seminars involving constitutional law, particularly in matters involving litigation under 42 U.S.C. §1983. I have been counsel to Plaintiffs in numerous cases involving the First and Fourth Amendments.

4.

I am admitted to practice before all state trial and appellate courts in Georgia, the United States District Court for the Northern District of Georgia, the United States Court of Appeals for the Eleventh Circuit and the United States Supreme Court. I have served as lead counsel and presented oral argument successfully in two constitutional law cases decided by the United States Supreme Court wherein my clients prevailed. *See Miller v. Johnson*, 515 U.S. 900 (1995) and *Abrams v. Johnson*, 521 U.S. 74 (1997).

5.

I am the senior partner within my law firm, Parks, Chesin & Walbert, P.C. I have specialized expertise in all matters related to federal constitutional law. I have been lead counsel in over five hundred Section 1983 cases. I have extensive experience litigating against the governmental bodies. *See e.g., Rogers v. Medical Ass. of Ga.*, 244 Ga. 151, 259 S.E.2d 85 (1979) (statutory delegation of governor's appointment powers to private association held unconstitutional); *Miller v. Johnson*, 515 U.S. 900 (1995) (legislation establishing congressional districts held unconstitutional); *Abrams v. Johnson*, 521 U.S. 74 (1997); (legislation establishing State legislative districts held unconstitutional); *Able v. Wilkins*, (redistricting plan for South Carolina's House of Representatives held unconstitutional); *Johnson v. Georgia Board of Regents*, 263 F.3d 1234 (11th Cir. 2001) (UGA admissions policy held unconstitutional); and *Smith v. Beasley*, 946 F.Supp. 1174 (D.S.C. 1997).

6.

I regularly consult with attorneys across the nation who are involved in constitutional cases of all kinds, and am considered to be an expert in this specialized area of the law. I believe I possess as much, if not more, experience with bringing constitutional challenges against government officials than any other attorney in this

state. My reputation is built on that experience and the success I have enjoyed in the many years I and my law firm have been on the cutting edge of constitutional law issues.

7.

I served as Plaintiff's lead counsel in this case. My standard hourly rate for clients who pay on a monthly basis is currently \$375.00 to \$450.00 per hour. While I have, on occasion, reduced that hourly rate for business clients promising substantial amounts of work on an ongoing basis, I charge the higher rate when I am retained to represent a client in a particular case, and value my time in contingent matters at the higher rate.

9.

I am able to fill all my available time with hourly work. However, I continue to devote significant time to cases taken on a contingent basis in reliance upon the various fee shifting statutes which permit the Court to award a full fee in cases where the plaintiff is the prevailing party. Due to the complexity of these matters, and the risk of not being compensated at all, relatively few attorneys who possess the experience and legal expertise to act as lead counsel will accept Section 1983 cases on a contingent fee basis. Given the importance of these cases not only to the clients, but to society in

general, it is critical lawyers with the requisite skill and expertise work on these cases. That, in turn, depends on the availability of fully compensatory fee awards.

10.

I received a recent fee award in a Section 1983 case filed in the United States District Court for the Northern District of Georgia (Baverman, J., affirmed by Pannell, J.). *See Viridi v. DeKalb County School District, et al.*, Civil Action File No. 1:97-CV-3485-CAP (Order dated 2/08/2008). I was awarded fees based on an hourly rate of \$375.00. This is a conservative hourly rate for my time in this case on the lower end of my hourly rate range.

11.

An itemized statement of all time and expenses incurred in the case by my self and the other attorneys employed by my firm at the time who worked on this case is attached as Exhibit "A" to this Affidavit. This time begins with the inception of the case, goes through discovery, motions for summary judgment, pretrial order preparation, and jury trial. This billing statement is a true and accurate statement of the attorney time and expenses of litigation attributable to the representation of the Plaintiff in this matter.

12.

William Atkins, a former partner with my firm billed approximately 216 hours litigating this case. His hourly rate was \$290. For work he conducted in a previous case, *Virdi v. DeKalb County School District, et al.*, Civil Action File No. 1:97-CV-3485-CAP, the Court approved his 2005 rate of \$250 an hour. [Doc. Nos. 261, 271]. In 2006, Mr. Atkins became a partner at my firm, and his rate increased to \$290 an hour. That rate is in line with other lawyers of Mr. Atkins' skill, experience, and reputation.

Mr. Atkins received his law degree from Emory University School of Law in 1994, where he was a member of the National Moot Court Team, Order of the Barristers, Lamar Inn of Court, and earned distinction as Best Oralist in the 1992 Intra-Mural Moot Court Competition. He has practiced law in Georgia since his admission to the Georgia Bar in 1994. He testifies that he has practiced law full time primarily in the area of civil litigation and labor and employment law since 1999.

13.

Eleanor Mixon Attwood, the attorney with our firm who assisted me throughout the case and at trial is filing a separate affidavit in support of the fee petition.

14.

I have exercised billing judgment throughout the case deleting time in the range of forty hours which I determined did not materially advance Plaintiff's position in this case or was duplicative of another attorney's efforts. I have also deleted twelve hours of time devoted to the preparation for an attendance at Chief Jimmy Williamson's deposition, a former Defendant in this case.

15.

In calculating a fair and reasonable hourly rate for this case, the lodestar rate should be calculated by multiplying each attorney's hourly rate by the number of hours reasonably devoted to the case by that attorney and thus adding up all of the fees. If competent and experienced counsel are to continue to accept the great financial and professional risks that are involved in these types of cases, this expertise needs to be acknowledged by a fee award that is fully compensatory. In addition, because of my firm's historical involvement in constitutional cases brought under Section 1983 against government officials, our attorneys were able to bring to the litigation an intimate knowledge of this specialized area of the law and a good depth understanding with respect to constitutional issues. It would have taken another law firm without that wealth of experience in Section 1983 litigation, significantly more time to provide the

same services, which justifies a higher rather than lower hourly rate within the range the attorney charges hourly clients in this market.


16.

I am seeking an hourly rate of \$400.00 per hour for my time outside of trial and \$425.00 per hour for my trial time. As you can see from Exhibit "A" to this Affidavit, I did not become involved in this case until the very late stages to minimize fees. My involvement only escalated when trial became likely. I believe my extensive experience in conducting civil trials justifies a slightly higher rate for actual trial time.

15.

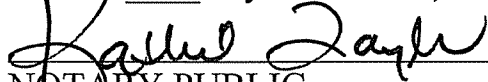
The verdict and judgment in this case constitute an excellent result in the litigation. It makes the plaintiff a prevailing party entitled to a fully compensatory fee award.

FURTHER AFFIANT SAYETH NOT.



A. LEE PARKS

Sworn to and subscribed before
me this 31 day of October, 2008.


NOTARY PUBLIC

My Commission expires: Jan. 24, 2010



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404/873-8000
Federal I.D. #58-1180767

Terrie and Gerald M. Buckner
655 Singley Drive
Lawrenceville GA 30044
USA

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Statement No. 157002

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Draft Statement

Fees

	Rate	Hours	
02/15/06 WJA Meeting with Terrie and Jerry Buckner regarding false arrest and MP case against UGA, et al; Telephone conference with Steve Lanier regarding case.	290.00	1.00	290.00
04/13/06 WJA Review e-mails from Jerry Buckner; Respond to same; telephone conference with Jerry Buckner regarding status and follow-up	290.00	0.20	58.00
04/18/06 WJA Review e-mail from Jerry Buckner re: potential witnesses and chronology of events.	290.00	0.20	58.00
04/28/06 EMA Attorney conference with WJA regarding facts of case; review file.	245.00	0.80	196.00
WJA Review and respond to e-mail from Jerry Buckner regarding status of case	290.00	0.20	58.00
05/03/06 EMA Attorney conference with WJA regarding case status; telephone conference with client.	245.00	0.50	122.50
WJA Meet with EMA regarding case strategy and potential defendants; Telephone conference with clients regarding set up conference call	290.00	0.50	145.00
WJA Review and respond to e-mail regarding status from Jerry Buckner	290.00	0.10	29.00
05/04/06 EMA Attorney conference with WJA regarding case; telephone conference with client regarding same.	245.00	0.80	196.00
WJA Telephone conference with Jerry and Terrie Buckner regarding strategy; Meet with EMA regarding strategy	290.00	0.80	232.00
05/10/06 EMA Draft complaint.	245.00	4.40	1,078.00
WJA Meet with EMA regarding legal issues in Complaint	290.00	0.50	145.00
05/23/06 EMA Send facts section of brief to client for review; attorney conference with WJA regarding same.	245.00	0.30	73.50
WJA Meet with EMA regarding Complaint	290.00	0.20	58.00

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	Rate	Hours	
05/25/06 EMA Review and revise complaint; legal research regarding malicious prosecution claim.	245.00	1.30	318.50
05/26/06 EMA Legal research regarding false arrest and malicious prosecution claims.	245.00	1.50	367.50
05/30/06 EMA E-mail to client regarding malicious prosecution claim.	245.00	0.20	49.00
05/31/06 EMA Attorney conference with WJA regarding status of case.	245.00	0.40	98.00
06/05/06 WJA Review complaint and discuss same with EMA; Review file materials concerning statements of witnesses during criminal investigation; Telephone conference with Cari Kaplan Johanson, re: district attorneys office investigation.	290.00	0.50	145.00
06/06/06 WJA Telephone conference with Steve Lanier, re: case strategy, immunity issues and complaint.	290.00	0.30	87.00
06/09/06 EMA Receipt and review of file.	245.00	0.90	220.50
06/13/06 WJA Review Complaint and Lanier transcripts of investigative interviews; Meet with EMA regarding fact issues and applicability to law	290.00	0.80	232.00
EMA Review transcripts; attorney conference with WJA regarding same.	245.00	1.00	245.00
06/14/06 WJA Telephone conference with Steve Lanier regarding issues with filing Complaint	290.00	0.60	174.00
EMA Telephone conference with Steve Lanier regarding facts of case and claims; attorney conference with WJA regarding same.	245.00	0.60	147.00
06/16/06 EMA Review and revise claims in complaint.	245.00	1.20	294.00
06/19/06 WJA Review and reply to e-mail from Jerry Buckner, re: Complaint.	290.00	0.20	58.00
07/20/06 EMA Telephone conference with co-counsel to discuss meeting.	245.00	0.30	73.50
07/24/06 EMA Set up meeting with co-counsel.	245.00	0.30	73.50
07/25/06 WJA Telephone conference with Terrie Buckner regarding complaint, etc.	290.00	0.50	145.00
08/01/06 WJA Telephone conference with Mike Opry regarding meeting; Telephone conference with Jerry Buckner regarding meeting; Telephone conference to Steve Lanier regarding meeting; E-mail to EMA regarding meeting	290.00	0.30	87.00

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	Rate	Hours	
08/02/06 WJA Meet with Steve Lanier and EMA regarding strategy and Complaint	290.00	1.20	348.00
EMA Attend meeting with co-counsel and WJA to discuss complaint.	245.00	1.20	294.00
08/04/06 WJA Prepare for and conduct meeting with Buckners regarding interview with investigators	290.00	1.00	290.00
WJA Conduct meeting with investigator	290.00	1.00	290.00
08/07/06 WJA Telephone conference with Steve Lanier regarding meeting with insurance investigator	290.00	0.20	58.00
08/11/06 WJA Telephone conference with Jerry Buckner regarding meeting; telephone conference with Steve Lanier.	290.00	0.20	58.00
08/29/06 WJA Review and revise Complaint.	290.00	1.00	290.00
08/30/06 WJA Continue review and revising Complaint	290.00	2.50	725.00
09/06/06 WJA Review and make further revisions to Complaint after client interview; telephone conference with client regarding issues in Complaint	290.00	2.50	725.00
09/08/06 WJA Final edits to Complaint	290.00	1.50	435.00
09/11/06 WJA Telephone conference with clients re: filing of complaint.	290.00	0.50	145.00
10/10/06 WJA Review and respond to e-mail from client regarding Answer to Complaint, etc.	290.00	0.10	29.00
10/11/06 WJA Review and respond to Jerry Buckner's e-mail regarding statute of limitations	290.00	0.20	58.00
10/20/06 JJD Review memo regarding discovery matters.	100.00	0.10	10.00
WJA E-mail to JJD and EMA regarding discovery plan.	290.00	0.50	145.00
11/08/06 WJA Review and respond to e-mail from Jerry Buckner regarding media involvement	290.00	0.30	87.00
WJA Telephone conference with opposing counsel regarding setting up Rule 26(f) Conference	290.00	0.20	58.00
11/13/06 WJA Rule 26(f) Conference with opposing counsel and EMA	290.00	0.70	203.00
EMA Drafted Initial Disclosures and CIP	245.00	1.50	367.50
EMA 26(f) Conference with opposing counsel.	245.00	0.70	171.50
11/15/06 WJA Review and reply to e-mail from Jerry Buckner regarding media angle	290.00	0.20	58.00
11/16/06 WJA Review Order on Rule 26 Conference; E-mail to AGH, EMA, etc. regarding same	290.00	0.50	145.00

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	Rate	Hours	
12/01/06 WJA Exchange e-mails on Scheduling Order with Eddie Snelling	290.00	0.20	58.00
12/07/06 EMA Draft Joint Preliminary Report, Initial Disclosures and written discovery.	245.00	2.50	612.50
12/27/06 EMA Review Joint Preliminary Report and discussed with opposing counsel.	245.00	0.40	98.00
12/28/06 WJA Review and revise Scheduling Order; Telephone conference with opposing counsel regarding same; Assist AGH in filing Scheduling Order	290.00	1.00	290.00
01/12/07 WJA Review discovery requests and exchange e-mails with opposing counsel regarding same	290.00	0.50	145.00
01/22/07 JJD Review file in preparation of organizing documents; begin to organize and label documents received from Lanier; identify privileged documents; conference with WJA regarding same.	100.00	3.00	300.00
02/13/07 WJA Review and respond to e-mail from Jerry Buckner regarding client's meeting with Karen Shetterley	290.00	0.20	58.00
02/19/07 WJA Follow-up on status of discovery responses, etc.	290.00	0.30	87.00
03/09/07 EMA Review documents at Attorney General's office.	245.00	2.80	686.00
WJA Conduct document review at Attorney General's office with EMA.	290.00	2.80	812.00
03/28/07 WJA Coordinate scheduling of depositions etc. with AGH	290.00	0.50	145.00
04/03/07 EMA Email opposing counsel regarding docs and scheduling depositions.	245.00	0.30	73.50
04/04/07 EMA Draft good-faith letter to opposing counsel; Discuss deposition scheduling with WJA and co-counsel.	245.00	0.70	171.50
04/05/07 JJD Telephone call with client regarding discovery responses.	100.00	0.40	40.00
04/09/07 JJD Conference with WJA regarding information requested by Client.	100.00	0.30	30.00
04/11/07 WJA Confirm discovery schedule and review discovery responses	290.00	1.00	290.00
04/16/07 JJD Telephone calls with clients regarding discovery responses.	100.00	0.60	60.00
WJA Coordinate preparing response to discovery with EMA and JD	290.00	0.50	145.00

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	Rate	Hours	
04/17/07 WJA Prepare discovery and prepare for deposition	290.00	2.50	725.00
04/18/07 EMA Draft discovery responses.	245.00	1.30	318.50
04/19/07 WJA Prepare for client's deposition; Meeting with client and her husband regarding same.	290.00	3.00	870.00
04/20/07 WJA Telephone conference re: rescheduling client's deposition.	290.00	0.50	145.00
04/23/07 WJA Meet with client in preparation for her deposition.	290.00	2.50	725.00
04/24/07 WJA Follow up deposition with detailed file review and revisions to discovery	290.00	1.50	435.00
04/25/07 WJA Attend to various matters regarding discovery, including revisions to discovery requests, deposition notices, etc.	290.00	2.50	725.00
04/26/07 WJA Further revision of discovery responses; Telephone conference with and email exchange with clients regarding same	290.00	2.00	580.00
04/27/07 WJA Telephone conference with Dr. Laura Johns regarding case	290.00	1.00	290.00
WJA Revise discovery responses, etc.; Exchange e-mails with client regarding same	290.00	2.50	725.00
05/01/07 WJA Prepare for and defend client's deposition; Meet with client following deposition regarding same.	290.00	6.50	1,885.00
05/02/07 EMA Met with clients; research work product issue.	245.00	3.00	735.00
WJA Review and revise Interrogatory responses	290.00	2.50	725.00
WJA Telephone conference with Trudy Friar regarding witness testimony; Meeting with Laura Johns Dautch regarding witness testimony	290.00	2.30	667.00
05/03/07 WJA Coordinate delivery of discovery documents to Eddie Snelling; Continue work on discovery responses and strategy regarding depositions, etc.	290.00	0.80	232.00
WJA Exchange e-mails and telephone conference with Bryan Webb, new opposing counsel in case, regarding discovery extension, depositions, etc.	290.00	0.50	145.00
05/07/07 WJA Continue work on interrogatory responses; E-mail to AGH and EMA regarding same	290.00	0.50	145.00
05/08/07 WJA Continue work on discovery, Interrogatory responses, etc.; Exchange e-mails with Bryan Webb regarding same	290.00	0.70	203.00

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	Rate	Hours	
05/09/07 WJA Review Interrogatory responses	290.00	2.50	725.00
05/14/07 WJA Continue work on scheduling depositions; discovery, interrogatory responses, etc.	290.00	1.50	435.00
05/16/07 WJA Reschedule depositions with Bryan Webb	290.00	0.50	145.00
05/17/07 WJA Finalize interrogatory responses and draft Consent Motion on discovery; Coordinate discovery with Bryan Webb	290.00	1.00	290.00
05/21/07 EMA Discuss depositions with Bill Atkins; send e-mails to opposing counsel regarding depositions.	245.00	0.50	122.50
WJA Follow-up with EMA and opposing counsel regarding deposition schedule	290.00	0.50	145.00
05/22/07 EMA Respond to Opposing counsel's e-mail regarding depositions.	245.00	0.20	49.00
WJA Review 30(b)(6) Notice; Discuss same with EMA; Incorporate electronic discovery issues	290.00	0.80	232.00
05/25/07 EMA Finish 30(b)(6) notice; Finish written subpoena.	245.00	1.00	245.00
05/30/07 EMA Preparation for depositions.	245.00	1.50	367.50
06/01/07 WJA Confirm deposition schedule and prepare for depositions	290.00	1.00	290.00
WJA Prepare for deposition of Chief Williamson, etc.	290.00	1.00	290.00
06/03/07 WJA Prepare for deposition of Chief Williamson; Telephone conference with Jerry Buckner regarding same	290.00	3.00	870.00
06/04/07 WJA Travel to/from Deposition of Chief Jimmy Williamson. (1/2 Travel Rate).	145.00	3.00	435.00
WJA Conduct deposition of Chief Jimmy Williamson	290.00	4.50	1,305.00
WJA Extended telephone conference with Steve Lanier regarding deposition of Chief Williamson, etc.	290.00	0.50	145.00
WJA Prepare for deposition of Dale Wetzelberger	290.00	2.50	725.00
06/05/07 WJA Travel to/from deposition of Dale Wetzelberger (1/2 Travel Rate).	145.00	3.00	435.00
WJA Prepare for deposition of Dale Wetzelberger	290.00	1.50	435.00
WJA Conduct deposition of Dale Wetzelberger.	290.00	5.00	1,450.00
WJA Telephone conference with Cori Johnson regarding Buckner case; Meet with Gwinnett District Attorney's office regarding case; Secure certified copy of Tammy Brookover's plea from clerk's office	290.00	1.00	290.00
WJA Telephone conference with Tammy Brookover regarding recollection of events and statement	290.00	0.50	145.00
EMA Discuss depositions and subpoena(s) with WJA.	245.00	0.40	98.00

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	Rate	Hours	
06/06/07 WJA Confirm scheduling for depositions, etc.; Prepare exhibits, etc. for depositions; Discuss same with EMA	290.00	1.50	435.00
EMA Locating and identifying exhibits for depositions; Discuss depositions with WJA.	245.00	1.10	269.50
06/07/07 WJA Work with EMA and AGH to prepare for deposition of George Stafford.	290.00	0.50	145.00
WJA Review transcripts of witness statements	290.00	1.00	290.00
EMA Conduct Stafford deposition.	245.00	3.30	808.50
EMA Travel to and from Athens (1/2 Travel Rate).	122.50	3.00	367.50
06/08/07 WJA Document review, identify exhibits for depositions; Telephone conference with witnesses, etc.	290.00	5.00	1,450.00
06/11/07 WJA Telephone conference with Steve Lanier regarding depositions; Telephone conference with Bryan Webb regarding depositions; Telephone conference with client regarding depositions; Select additional exhibits for depositions and discuss strategy with EMA	290.00	3.50	1,015.00
EMA Discuss upcoming depositions with WJA and opposing counsel.	245.00	0.60	147.00
06/12/07 WJA Travel to Athens, GA for depositions (1/2 Travel Rate).	145.00	1.50	217.50
WJA Prepare for and conduct 30(b)(6) deposition	290.00	2.50	725.00
WJA Meet with client and EMA; Detailed review of exhibits and prepare for depositions.	290.00	4.00	1,160.00
WJA Meet with EMA and prepare for upcoming depositions of Leiter; Hedgelon and Humphries	290.00	1.00	290.00
EMA File review and research in preparation for Defendants witness depositions; Research failure to investigate defense.	245.00	10.50	2,572.50
06/13/07 WJA Participate in depositions of Karen Hedgelon and E. Humphries; Review and organize UGA Police Dept file and discuss various matters with opposing counsel	290.00	9.50	2,755.00
WJA Prepare for deposition of Detective Walls	290.00	2.00	580.00
EMA Take and attend defendant witness's depositions.	245.00	8.00	1,960.00
EMA Travel to and from Athens. (1/2 Travel Rate).	122.50	3.00	367.50
06/14/07 WJA Prepare for and conduct Deposition of Detective Walls	290.00	10.50	3,045.00
WJA Prepare for deposition of Karen Shetterley	290.00	1.00	290.00
EMA Telephone conference with various witnesses; Research out of district subpoena preparation; Organize subpoena preparation.	245.00	2.50	612.50
06/15/07 WJA Prepare for and conduct deposition of Karen Shetterley	290.00	9.50	2,755.00
WJA Travel back from depositions in Athens, GA (1/2 Travel Rate).	145.00	1.50	217.50
EMA Travel to and from Athens (1/2 Travel Rate)..	122.50	3.00	367.50

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	Rate	Hours	
EMA Attend deposition; telephone conference with clients regarding same.	245.00	6.40	1,568.00
06/17/07 WJA Telephone conference with client regarding follow-up on depositions, etc.	290.00	0.10	29.00
06/18/07 WJA Telephone conference with Steve Lanier regarding depositions and document review; Telephone conference with Buckners regarding depositions, etc.; Organize exhibits from depositions	290.00	2.00	580.00
06/19/07 WJA Meet with EMA regarding course of action on discovery	290.00	0.30	87.00
EMA Discuss status and strategy with WJA.	245.00	0.30	73.50
06/22/07 WJA Follow up with EMA regarding document review and witness interviews	290.00	0.30	87.00
06/26/07 WJA Coordinate scheduling of final deposition, document review, etc/ with Bryan Webb and EMA, etc.	290.00	0.50	145.00
06/27/07 WJA Continue work in finalizing discovery; Exchange e-mails with clients, Bryan Webb, etc.	290.00	1.00	290.00
EMA Telephone conference with witness; Email opposing counsel regarding document review.	245.00	0.30	73.50
06/28/07 WJA Telephone conference with Buckners regarding status of discovery, Summary Judgment, etc.; Telephone conference with EMA regarding scheduling of Dellinger, document review, etc.; Follow up with AGH and EMA regarding scheduling	290.00	0.50	145.00
EMA Discuss possible new dates for depositions with opposing counsel and WJA.	245.00	0.50	122.50
06/29/07 WJA Confirm status of deposition, etc.	290.00	0.20	58.00
07/02/07 WJA Telephone conference with Bryan Webb regarding extending discovery, documents, etc.; Draft discovery motion; Telephone conference with clerk of court regarding extending discovery	290.00	1.00	290.00
WJA Follow up with Brown & Gallo regarding status of depositions	290.00	0.20	58.00
07/03/07 WJA Assign tasks regarding completing discovery, depositions, etc. to EMA and AGH	290.00	0.50	145.00
07/13/07 EMA Travel to and from Athens (1/2 Travel Rate)..	122.50	3.00	367.50
EMA Document review; Meeting with opposing counsel.	245.00	6.50	1,592.50
07/24/07 WJA Review status of outstanding discovery matters and confirm schedule for last			

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	Rate	Hours	
deposition	290.00	1.00	290.00
07/25/07 WJA Prepare for deposition of Eric Dellinger	290.00	1.50	435.00
07/26/07 WJA Travel to/from deposition of Eric Dellinger in Athens, GA (1/2 Travel Rate).	145.00	3.50	507.50
WJA Prepare for and conduct deposition of Eric Dellinger	290.00	5.50	1,595.00
07/27/07 EMA Discuss deposition schedule and issues with WJA.	245.00	0.50	122.50
07/30/07 EMA Conference with WJA regarding "to do" tasks to complete.	245.00	0.50	122.50
WJA Follow up with remaining discovery matters, witness interview, etc.	290.00	1.50	435.00
07/31/07 EMA Contact witnesses and review interview notes.	245.00	1.20	294.00
WJA Review and respond to Terrie Buckner's e-mail and continue follow up on remaining discovery issues	290.00	0.50	145.00
08/01/07 EMA Witness interview.	245.00	1.00	245.00
WJA Finalize scheduling of witness meeting; Exchange e-mails with EMA regarding same	290.00	0.50	145.00
08/02/07 EMA Telephone conference with witness.	245.00	0.70	171.50
WJA Meet with Trudy Friar regarding testimony at trial	290.00	1.20	348.00
WJA Exchange e-mails with client EMA regarding witnesses	290.00	0.60	174.00
08/03/07 EMA Attend and conduct witness interviews.	245.00	5.00	1,225.00
WJA Travel to/from Gwinnett Center Technical and Adult Education (1/2 Travel Rate).	145.00	1.50	217.50
WJA Conduct interviews with Laura Johns, Sharon Hausmann and Pat Minish	290.00	5.00	1,450.00
EMA Travel to and from Gwinnett. (1/2 Travel Rate).	122.50	1.50	183.75
08/06/07 EMA Telephone conference with opposing counsel, discussed witness interviews.	245.00	0.50	122.50
WJA E-mail to Terrie Buckner regarding interview of witnesses; Telephone conference with Bryan Webb regarding evidence, mediation and summary judgment	290.00	1.00	290.00
08/07/07 WJA Follow up on e-mail from Bryan Webb regarding Request to Admit	290.00	0.20	58.00
08/20/07 EMA File review; Draft Laura Johns' affidavit.	245.00	4.00	980.00
08/23/07 EMA Discuss Laura Johns' affidavit with WJA.	245.00	0.80	196.00
08/27/07 EMA Meet with WJA, review and discuss Johns' affidavit; Edit Johns' affidavit; contact Hausmann and Martin regarding affidavit and			

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	Rate	Hours	
documents.	245.00	2.50	612.50
08/28/07 WJA Review and discuss Laura Johns' affidavit with EMA	290.00	0.30	87.00
EMA Telephone conference with and emails to witnesses.	245.00	0.50	122.50
08/29/07 EMA Email witness affidavits; Review and edit affidavits.	245.00	1.00	245.00
WJA Review and revise Affidavit of Laura Johns	290.00	0.30	87.00
08/30/07 EMA Send Johns' affidavit to witness.	245.00	0.20	49.00
09/06/07 WJA Exchange e-mails with opposing counsel regarding extension for Summary Judgment response, etc; Follow up with EMA on status of Affidavits, etc	290.00	0.50	145.00
09/07/07 WJA Exchange e-mails and discuss with EMA regarding meeting with Pat Minish	290.00	0.30	87.00
09/11/07 EMA Review documents at GAYC.	245.00	1.20	294.00
09/26/07 WJA Exchange e-mails with Bryan Webb regarding additional pages for Summary Judgment brief	290.00	0.20	58.00
10/03/07 EMA Discuss Motion for Summary Judgment strategy with WJA; Telephone conference with opposing counsel regarding extension for response.	245.00	0.70	171.50
10/09/07 WJA Meet with EMA and assign tasks for completing Motion for Summary Judgment	290.00	0.50	145.00
10/11/07 WJA Meet with EMA to confirm plans for Motion for Summary Judgment; E-mail to Jerry Buckner regarding conference on same	290.00	0.50	145.00
11/16/07 EMA Draft motion for extension of time.	245.00	0.30	73.50
11/19/07 EMA Document review; Discuss response to Motion for Summary Judgment with client and WJA.	245.00	1.20	294.00
11/20/07 EMA Brainstorm Motion for Summary Judgment response with WJA; review documents and read Shetterley deposition.	245.00	4.00	980.00
11/26/07 EMA Read through depositions for response to Motion for Summary Judgment.	245.00	5.00	1,225.00
WJA Research legal issues in preparation for response to Motion for Summary Judgment.	290.00	2.00	580.00
11/27/07 EMA Finalize reading depositions; Review of exhibits.	245.00	4.70	1,151.50
WJA Research legal issues in preparation for response to Motion for Summary Judgment.	290.00	2.50	725.00

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	Rate	Hours	
11/28/07 WJA Draft brief in opposition to Motion for Summary Judgment.	290.00	5.50	1,595.00
EMA Draft fact section of Motion for Summary Judgment response.	245.00	11.00	2,695.00
11/29/07 WJA Draft brief in opposition to Motion for Summary Judgment.	290.00	6.50	1,885.00
EMA Continue drafting Motion for Summary Judgment response.	245.00	7.80	1,911.00
11/30/07 WJA Draft brief in opposition to summary judgment.	290.00	4.50	1,305.00
EMA Continue drafting Motion for Summary Judgment response.	245.00	9.00	2,205.00
12/02/07 WJA Draft legal component of Brief in Opposition to Motion for Summary Judgment	290.00	9.30	2,697.00
12/03/07 EMA Finish response to Motion for Summary Judgment.	245.00	8.50	2,082.50
WJA Draft Brief in Opposition to Motion for Summary Judgment	290.00	7.50	2,175.00
12/18/07 WJA Review and respond to client e-mails	290.00	0.20	58.00
01/14/08 WJA Review and reply to e-mail from Jerry Buckner	290.00	0.10	29.00
01/15/08 WJA Review Reply Brief; Email to Jerry Buckner regarding same	290.00	0.50	145.00
04/01/08 ALP Telephone conference with Mr. Lanier.	400.00	0.30	120.00
04/02/08 ALP Telephone conference with Mr. Lanier: memo to Bill Atkins.	400.00	0.40	160.00
ALP Miscellaneous telephone conference with Mr. Lanier; review pleadings.	400.00	1.00	400.00
ALP Review file for client meeting.	400.00	1.00	400.00
04/07/08 ALP File review; miscellaneous emails with Bill Atkins.	400.00	1.00	400.00
04/11/08 EMA Draft Pre-Trial Motions and discuss same with opposing counsel.	245.00	1.60	392.00
04/14/08 ALP Conference call with the Court.	400.00	0.30	120.00
04/23/08 ALP Review Judge Land decision in UGA / Pharmacy case.	400.00	0.30	120.00
04/30/08 ALP Work on reply brief.	400.00	0.80	320.00
05/01/08 EMA Discuss pleadings with ALP, AYC and SW.	245.00	0.50	122.50
05/12/08 ALP Draft reply brief on Williamson/official capacity suit/sovereign immunity issues; case law review.	400.00	2.00	800.00

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	Rate	Hours	
05/13/08 ALP Review recent 11th Circuit qualified immunity claims.	400.00	0.40	160.00
06/12/08 ALP Review Order.	400.00	1.00	400.00
06/16/08 ALP Telephone conference with Stephen Lanier regarding Summary Judgment; miscellaneous emails with client and opposing counsel.	400.00	0.50	200.00
ALP Letter to opposing counsel regarding case status / settlement.	400.00	0.30	120.00
07/10/08 EMA Discuss trial strategy with ALP; Telephone conference with opposing counsel regarding Pretrial Order and various deadlines.	245.00	0.60	147.00
07/21/08 EMA Discuss Pretrial Order with ALP and opposing counsel.	245.00	0.50	122.50
ALP Conference with Eleanor Attwood regarding pretrial; review court order.	400.00	0.40	160.00
07/24/08 ALP Telephone conference with Bryan Webb; draft letter proposal of settlement; work on pretrial order; work on fact stipulations and jury charges; review pattern charges.	400.00	2.80	1,120.00
07/25/08 ALP Finalize settlement letter; work on pretrial order; letter to Steve Lanier.	400.00	1.20	480.00
07/29/08 EMA Create witness list; document review and flagged trial exhibits; Discuss deadlines with ALP; Draft Motion to Extend the Pre-Trial deadlines.	245.00	6.40	1,568.00
ALP Work on proposed order; miscellaneous conferences with Eleanor Attwood; work on settlement letter.	400.00	0.80	320.00
07/30/08 EMA Draft jury charges; Voir Dire, Verdict form and stipulated facts.	245.00	5.60	1,372.00
07/31/08 EMA Telephone conference with opposing counsel regarding trial exhibits; consult with SKN regarding format for supplying exhibits to opposing counsel; send exhibits and list of witnesses.	245.00	0.50	122.50
08/01/08 ALP Work on jury charges.	400.00	1.00	400.00
EMA Telephone conference with opposing counsel regarding fact stipulation.	245.00	0.30	73.50
08/04/08 ALP Review materials from client on job search; work on Pretrial Order; conference with Eleanor Attwood.	400.00	1.00	400.00
EMA Review mitigation documentation prior to sending to opposing counsel.	245.00	0.70	171.50
08/06/08 EMA Discuss exhibit list with Cleveland; Email correspondence and telephone conferences with			

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	Rate	Hours	
opposing counsel; Draft fact statement.	245.00	2.00	490.00
08/07/08 ALP Order review; case law cited in Order review; begin jury charges.	400.00	1.00	400.00
08/09/08 ALP Work on Pre-Trial Order and jury charges.	400.00	2.00	800.00
08/11/08 ALP Prepare voir dire; jury instructions; revise document list; prepare jury verdict; letter to opposing counsel; legal research; document review (exhibits).	400.00	9.00	3,600.00
08/12/08 ALP Work on voir dire; fact stipulations; jury instructions; Pretrial Order.	400.00	5.30	2,120.00
08/13/08 JER Reviewed file in preparation of writing research memos	225.00	1.00	225.00
ALP Memo to James Radford regarding damages research.	400.00	0.40	160.00
ALP Work on trial plan; memo to associates regarding assignments.	400.00	1.00	400.00
ALP Review Pretrial Order from Bryan Webb.	400.00	0.30	120.00
08/14/08 JER Research issues related to immunity; reviewing file; research issues related to false arrest and malicious prosecution	225.00	5.00	1,125.00
08/15/08 JER Researched elements of malicious prosecution claim; 1988 and damages for attorney fees	225.00	7.00	1,575.00
ALP Deposition review and witness exam preparation.	400.00	2.50	1,000.00
08/16/08 ALP Deposition review and pretrial preparation.	400.00	2.00	800.00
08/18/08 JER Research and preparation of issues related to malicious prosecution and appropriate measure of damages	225.00	7.00	1,575.00
08/19/08 JER Writing memo regarding malicious prosecution and damages	225.00	4.50	1,012.50
ALP Prepare for and attend pretrial conference.	400.00	1.50	600.00
ALP Conference call with Bryan Webb regarding settlement.	400.00	1.00	400.00
ALP Travel to and from Columbus for pretial conference. (1/2 Travel Rate).	200.00	2.00	400.00
08/20/08 ALP Letter to client regarding pretrial conference.	400.00	0.30	120.00
ALP Letter to opposing counsel regarding economic damages; various trial preparation issues.	400.00	0.40	160.00
08/22/08 ALP Continue deposition review.	400.00	2.00	800.00
08/28/08 ALP Miscellaneous emails with Jerry Buckner.	400.00	0.20	80.00
09/02/08 EMA Draft preparation memo and first draft of damages slides.	245.00	3.80	931.00

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	Rate	Hours	
ALP Conference with Eleanor Attwood regarding joint exhibits; trial preparation.	400.00	0.30	120.00
09/04/08 ALP Work on trial prep (joint exhibit review) and exhibits	400.00	0.40	160.00
09/10/08 EMA Create witness examination; organize computer file for trial.	245.00	6.00	1,470.00
ALP Conference with Eleanor Attwood regarding trial.	400.00	0.40	160.00
09/11/08 EMA Prepare and create witness examination for Plaintiff.	245.00	8.00	1,960.00
ALP Telephone conference with Steve Lanier regarding trial preparations; conference with Eleanor Attwood regarding pretrial preparations	400.00	1.20	480.00
09/12/08 EMA Prepare for Shetterley cross examination.	245.00	7.50	1,837.50
ALP Trial Preparation witness exhibits	400.00	1.80	720.00
BAC Create Deposition summaries.	90.00	3.00	270.00
WSC Create Deposition summaries.	90.00	2.50	225.00
09/13/08 ALP Work on witness examination and trial preparation	400.00	3.80	1,520.00
09/15/08 EMA Prepare for Dellinger examination.	245.00	3.30	808.50
BAC Trial preparation.	90.00	5.00	450.00
WSC Create deposition summaries.	90.00	3.00	270.00
09/16/08 EMA Finish Walls and Dellinger cross exam outlines.	245.00	7.20	1,764.00
ALP Conference with EMA trial preparation	400.00	0.30	120.00
ALP Document review to finalize exhibit list.	400.00	0.40	160.00
BAC Trial preparation.	90.00	5.00	450.00
WSC Create deposition summaries.	90.00	5.00	450.00
09/17/08 EMA Prepare examinations for witnesses.	245.00	7.80	1,911.00
ALP Continue review and revision of witness outlines (Dellinger/ Walls)	400.00	1.50	600.00
BAC Trial preparation.	90.00	4.00	360.00
WSC Deposition summary.	90.00	3.50	315.00
09/18/08 EMA Prepare for witness exams; Create PowerPoint slideshow.	245.00	8.20	2,009.00
ALP Conference with EMA regarding trial	400.00	0.40	160.00
ALP Miscellaneous emails to Bryan Webb.	400.00	0.40	160.00
WSC Create deposition summaries.	90.00	6.50	585.00
09/19/08 EMA Set up client meeting; Telephone conference with co-counsel regarding witnesses; Email opposing counsel regarding addresses for witnesses.	245.00	1.20	294.00
ALP Work on trial preparation.	400.00	1.50	600.00
BAC Trial preparation	90.00	7.00	630.00
WSC Create deposition summaries.	90.00	4.50	405.00

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	Rate	Hours	
09/22/08 EMA Review depositions; Contact witnesses; Contact Judge Land's clerk and deputy in charge of Athens Court regarding jury list; telephone conference with opposing counsel regarding documents.	245.00	3.00	735.00
ALP Draft trial memorandum.	400.00	10.00	4,000.00
ALP Work on Closing Argument.	400.00	3.00	1,200.00
WSC Create deposition summaries.	90.00	6.00	540.00
09/23/08 EMA Telephone conferences and emails to and from witnesses; Telephone conference with opposing counsel regarding several issues, including exhibits, witnesses and availability, settlement conference.	245.00	3.20	784.00
ALP Continue work on trial memorandum.	400.00	6.00	2,400.00
ALP Work on additional jury charges.	400.00	0.60	240.00
ALP Miscellaneous telephone conferences with Steve Lanier regarding trial preparation.	400.00	0.70	280.00
ALP Work on witness statements.	400.00	0.70	280.00
09/24/08 EMA E-mails and telephone conferences with client and witnesses; Preparation for trial; Lunch with MK regarding Judge Land.	245.00	1.80	441.00
ALP Draft motion to add witness (Lanier).	400.00	0.30	120.00
ALP Work on jury charges; work on trial memorandum.	400.00	2.50	1,000.00
09/25/08 EMA Prepare witnesses; Edit trial memo; telephone conferences with witnesses; discuss settlement with opposing counsel and ALP.	245.00	6.00	1,470.00
ALP Work on trial memorandum and witness exams.	400.00	1.80	720.00
09/26/08 EMA Interview witnesses; Met with opposing counsel and reviewed exhibits; Went to courtroom to see electronic hookup and equipment.	245.00	6.00	1,470.00
EMA Travel to and from Athens (1/2 Travel Rate).	122.50	3.00	367.50
WSC Create deposition summaries.	90.00	2.50	225.00
09/27/08 ALP Continue to work on trial memorandum, argument and witness exams.	400.00	6.00	2,400.00
09/28/08 EMA Create trial strategy and read through Schramski deposition.	245.00	8.00	1,960.00
ALP Client conference regarding witness preparation.	400.00	3.50	1,400.00
ALP Work on trial memorandum	400.00	2.00	800.00
09/29/08 JER Research and draft memo regarding striking employee - jurors for cause	225.00	2.00	450.00
EMA Compile Plaintiff and Joint Exhibits; Travel to and from Sugar Hill; Interview Laura Jones.	245.00	9.20	2,254.00
ALP Work on exhibits.	400.00	1.50	600.00
ALP Work on witness preparation.	400.00	1.50	600.00
BAC Trial preparation.	90.00	7.00	630.00
WSC Trial prepreparation.	90.00	7.00	630.00

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	Rate	Hours	
09/30/08 EMA Finalize exhibits; Create examination strategy; Create task list.	245.00	10.50	2,572.50
JER Researching juror strike issues	225.00	0.50	112.50
ALP Prepare complete jury charge and draft motion for submission to the Court.	400.00	2.30	920.00
ALP Review witness statements from criminal case and work on witness exams.	400.00	2.70	1,080.00
ALP Conference with Eleanor Attwood regarding documents; joint exhibits, plaintiff's exhibits.	400.00	1.50	600.00
ALP Continue witness exam preparation: Lanier (including letter); Friar and Brookover.	400.00	3.00	1,200.00
BAC Trial Preparation	90.00	7.00	630.00
WSC Trial preparation.	90.00	7.00	630.00
10/01/08 WSC Trial preparation.	90.00	7.00	630.00
EMA Interview witnesses; create cross examination outlines	245.00	9.00	2,205.00
ALP Continue preparation for trial; Draft Motion to Amend Pretrial Order regarding jury charges; Finalize revised jury charges; Work on various witness examinations.	400.00	10.00	4,000.00
10/02/08 WSC Trial preparation.	90.00	7.50	675.00
WSC Trial preparation.	90.00	7.50	675.00
EMA Interview witnesses; Work on witness examination outlines.	245.00	9.00	2,205.00
ALP Work on opening.	400.00	4.00	1,600.00
ALP Work on closing.	400.00	1.50	600.00
ALP Work on witness exams.	400.00	2.50	1,000.00
ALP Work on voir dire; Review juror lists; Telephone conference with Tolley.	400.00	1.80	720.00
10/03/08 EMA Review and edit witness exams; Confirm orderly exhibits; Review electronic devises.	245.00	8.00	1,960.00
ALP Trial preparation; Witness preparation (Lanier, Mr. and Mrs. Buckner); Prepare motion to amend Pretrial Order regarding voir dire, verdict form and exhibit lists; work on opening and PowerPoint.	400.00	11.00	4,400.00
10/04/08 EMA Prepare witness exam notebooks; Finish Walls' cross exam outline	245.00	6.00	1,470.00
ALP Witness meetings; trial preparation.	400.00	11.00	4,400.00
10/05/08 EMA Prepare clients; Pack materials and supplies.	245.00	8.00	1,960.00
EMA Travel to Athens (1/2 Travel Rate).	122.50	1.50	183.75
ALP Trial preparation.	400.00	8.00	3,200.00
ALP Travel to Athens (1/2 Travel Rate).	200.00	2.00	400.00
10/06/08 EMA Prepare for and attend trial.	245.00	8.50	2,082.50
ALP Attend Trial.	425.00	8.50	3,612.50
ALP Trial preparation.	400.00	4.00	1,600.00
10/07/08 EMA Attend Trial.	245.00	7.00	1,715.00
EMA Trial preparation.	245.00	4.50	1,102.50
ALP Attend Trial.	425.00	7.00	2,975.00

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		Rate	Hours	
	ALP Trial preparation.	400.00	5.00	2,000.00
10/08/08	EMA Attend Trial.	245.00	7.00	1,715.00
	EMA Trial preparation.	245.00	1.00	245.00
	ALP Attend Trial.	425.00	7.00	2,975.00
	ALP Trial preparation.	400.00	1.00	400.00
10/09/08	EMA Attend trial, receive verdict; Conference with clients regarding appeal.	245.00	3.00	735.00
	EMA Travel from Athens (1/2 Travel Rate).	122.50	2.00	245.00
	ALP Attend trial, receive verdict; Conference with clients regarding appeal.	400.00	3.00	1,200.00
	ALP Travel from Athens (1/2 Travel Rate).	200.00	2.00	400.00
	AYC Drafted press release	290.00	1.00	290.00
10/13/08	EMA Email client regarding Shetterley photo; Email opposing counsel regarding insurance policy; Deconstruct trial materials.	245.00	1.70	416.50
	ALP Continue work on fee petition; draft affidavit; telephone conference with Steve Lanier regarding fee application.	400.00	1.90	760.00
10/14/08	EMA Finish first draft of fee petition; Draft thank you notes to witnesses; call Court reporter regarding transcript.	245.00	5.30	1,298.50
	ALP Continue work on fee petition/affidavits; letter to clients regarding post judgment process.	400.00	1.60	640.00
	ALP Telephone conference with opposing counsel regarding fee issue / possible settlement.	400.00	0.30	120.00
10/15/08	EMA Retrieve affidavits for fee petition; Email opposing counsel regarding insurance policies.	245.00	0.50	122.50
10/16/08	EMA Telephone conference with client regarding television interview.	245.00	0.30	73.50
	ALP Two telephone conferences with clients regarding status.	400.00	0.20	80.00
10/17/08	EMA Locate and review photographs for Richard Belcher.	245.00	0.50	122.50
10/20/08	EMA Finish fee petition and supporting materials.	245.00	4.00	980.00
10/22/08	EMA Draft Motion for Extension; call clerk's office regarding same.	245.00	0.70	171.50
	ALP Work on fee petition; Miscellaneous telephone conferences with Steve Lanier; conference with Eleanor Attwood.	400.00	0.80	320.00

For Current Services Rendered

930.20

246,388.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
A. Lee Parks, Jr.	6.00	\$200.00	\$1,200.00

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A. Lee Parks, Jr.	175.00	400.00	70,000.00
A. Lee Parks, Jr.	22.50	425.00	9,562.50
William J. Atkins	14.00	145.00	2,030.00
William J. Atkins	205.10	290.00	59,479.00
Andrew Y. Coffman	1.00	290.00	290.00
Eleanor M. Attwood	20.00	122.50	2,450.00
Eleanor M. Attwood	347.70	245.00	85,186.50
Jacqueline J. Davis	4.40	100.00	440.00
William S. Cleveland	69.50	90.00	6,255.00
Benjamin A. Clary	38.00	90.00	3,420.00
James E. Radford, Jr.	27.00	225.00	6,075.00

Expenses

Photocopies at 20 cents per page	816.20
Postage	83.89
Facsimile Charges	83.00
Total Expenses Thru 10/28/08	983.09

Advances

05/31/06	Outside Reproduction Costs/GA Superior Court Admin costs	5.00
07/06/06	Miscellaneous Client Costs /Intelius Investigative Reports	79.60
09/08/06	Filing & Service Fees Clerk, United States District Court	350.00
09/21/06	Process Service Crqwford, Shaney & Rasco, Inc.	300.00
04/12/07	Outside Reproduction Costs Department of Law- State of GA	410.25
04/26/07	Courier & Delivery Service - Federal Express	13.55
05/01/07	Courier & Delivery Service - Georgia Messenger Service	10.95
05/02/07	Courier & Delivery Service - Georgia Messenger Service	15.99
05/30/07	Court Reporter - Brown & Gallo, Inc	611.61
05/30/07	Court Reporter - Brown & Gallo	160.95
06/18/07	Travel Expenses/ William J. Atkins	207.56
06/20/07	Mileage & Parking Expense Eleanor Attwood	142.80
07/24/07	Court Reporter - Brown & Gallo, Inc	1,157.45
07/24/07	Court Reporter - Brown & Gallo, Inc	1,047.50
07/24/07	Court Reporter - Brown & Gallo, Inc	366.20
07/24/07	Court Reporter - Brown & Gallo, Inc	577.65
07/24/07	Court Reporter - Brown & Gallo, Inc	1,800.00
07/24/07	Court Reporter - Brown & Gallo, Inc	1,989.45
07/24/07	Court Reporter - Brown & Gallo, Inc	1,589.00
08/27/07	Mileage Expense Eleanor Attwood	47.60
09/04/07	Court Reporter - Brown & Gallo, Inc	1,434.95
09/22/08	Witness Fee Expense and Mileage/ Karen Hedgelon	53.00
09/23/08	Witness Fee Expense/mileage- Carla Rogg	82.12
09/23/08	Witness Fee/Mileage Expense Sharen Hausmann	82.71
09/23/08	Witness Fee/Mileage Expense -Pat Minish	77.44
09/23/08	Witness Fee/Mileage Expense-Tamara Brookover	75.10
09/24/08	Witness Fee/Mileage- Expense Laura Johns	70.42
09/24/08	Witness Fee Expense - Trudy Friar	49.95
10/01/08	Witness Fee /mileage/Expense Trudy Friar	58.14
10/10/08	Travel/trial - Meals	215.00
10/10/08	Travel/trial - Hotel	1,314.55
10/23/08	Travel Expense/mileage/Eleanor Attwood	111.18
Total Advances	14,507.67	

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Total Current Work 261,878.76

Payments

04/15/08 Payment - Thank you (received from Lanier Firm) -6,208.50

Balance Due \$255,670.26

Billing History

<u>Fees</u>	<u>Expenses</u>	<u>Advances</u>	<u>Finance Charge</u>	<u>Payments</u>
246,388.00	983.09	14,507.67	0.00	6,208.50